

December 16, 2022

Melanie Biscoe  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460-0001

**RE: Docket Number: EPA-HQ-OPP- 2022-0908-0001. ESA Workplan Update: Nontarget Species Mitigation for Registration Review and Other FIFRA Actions. Document titled “Appendix to the ESA Workplan Update: Proposed Label Language for Public Comment”**

Dear Melanie Biscoe:

The undersigned cotton organizations represent agricultural stakeholders who are very interested in the Appendix to the *ESA Workplan Update: Nontarget Species Mitigation for Registration Review and Other FIFRA Actions*. In mid-November, the EPA released the document for public comment with the notation of an extra two weeks in recognition of the holidays. While we appreciate the agency's allowance of extra review time, we are still concerned that this timeframe, along with the scheduled release of other major Federal agency actions such as waters of the U.S., does not allow sufficient time for our organizations, their leadership and individual growers to review the information and prepare comments to submit for the record. For this reason, we are requesting a 60-day extension of the public comment period.

The protection of endangered species has become a major component of the pesticide approval/review process and has a troublesome integration period. We agree with and support EPA's efforts to resolve or lessen these issues using this ESA Workplan. As such, it is important that stakeholders have the appropriate time to thoroughly review this update and provide comments that will aid the agency in producing a plan workable for species and producers.

Thank you for your consideration of our request for a 60-day extension of the comment period.

Sincerely,

Agricultural Council of Arkansas  
California Cotton Ginners and Growers Association  
Delta Council  
Georgia Cotton Commission  
Kansas Cotton Association  
Louisiana Farm Bureau Federation  
Mississippi Farm Bureau Federation  
National Cotton Council  
North Carolina Cotton Producers Association  
Oklahoma Cotton Council  
Plains Cotton Growers, Inc.  
Rolling Plains Cotton Growers  
Southern Cotton Growers, Inc.  
Southern Rolling Plains Cotton Growers Association  
South Texas Cotton and Grain Association  
Tennessee Farm Bureau  
Western Agricultural Processors Association

Cc: Rod Snyder  
Jake Li